

**PLAINTIFFS' ANSWERS TO
LOCAL RULE 26.01
INTERROGATORIES**

Page 1 of 3

B. As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER: The Plaintiffs are entitled to and seek a trial by jury on all claims set forth in the Complaint.

C. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER: The Plaintiffs in this matter are individuals.

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

ANSWER: The Aiken Division is the appropriate venue for this case because the alleged facts underlying Plaintiffs' claims occurred in part in this Division and the Defendants transact business in this District.

E. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a

determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: No.

/s/ Penny Hays Cauley
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